To Whom It May Concern:

I’m sure all these pro wind comments are well-intentioned people thinking that this industrial complex in Nantucket Sound is a way to save the world from global warming, and a way to end all the wars in the Middle East, because the US won’t need to import oil anymore. However that will not be the case. This complex will have a minuscule effect on the amount of oil we import from the middle east and global warming, while we all should investigate it, no clear evidence is out, that fossil fuel burning is the cause of the warming temperatures, it could be cycle that the earth is going thru. Either way these are not the reason to build an industrial complex in a fragile marine environment like Nantucket Sound.

Let’s learn by example: So here's a proposal for a cheap, renewable, non-polluting alternative energy source: Construct four hydro dams on the lower Snake River.

That proposal, eagerly embraced and implemented by Congress, is about 50 years old, but I cite it to make the point that all energy production has environmental costs. In this case the cost was the extirpation--now nearly complete--of the mightiest salmon and steelhead runs on the planet. The proposal was made by bureaucrats and engineers who either hadn't bothered to answer such questions as "What will happen to the fish?" or answered them incorrectly and in abject ignorance, as in the case of the National Marine Fisheries Service, which proclaimed: "We can work wonders with this [fish] transportation system; we can establish runs of both steelhead trout and salmon in far greater numbers than existed before."

Conservationists have been asking the same question about the giant wind farm planned by Cape Wind Associates for Nantucket Sound off Massachusetts--arguably the most productive marine fish habitat in our nation. Cape Wind and the main permitting agency, the US Army Corps of Engineers, have had five years to provide an answer. So far they haven't.

I don't doubt Mark Rodgers, Cape Wind's director of communications, when he informs me that there aren't that many places where one finds shallow, windy water with relatively small waves and little ship traffic, and that Horseshoe Shoals (the best fishing spot in Nantucket Sound) is an ideal location for one of the world's largest offshore wind farms. On the other hand, neither are there that many (or any) places that surpass Horseshoe Shoals in its abundance of fish, sea birds and marine mammals. In fact, the Sound has been designated as "Essential Fish Habitat" under the Fisheries Conservation and Management Act. What's more, it's protected as an avian migration corridor by the Migratory Bird Treaty Act, as critical habitat for imperiled birds, mammals and turtles under the Endangered Species Act, and as a marine sanctuary by the Commonwealth of Massachusetts because of its importance as "spawning, nursery and feeding grounds, and migration routes," its "high biological productivity and diversity," and its significance as a "premier marine oriented recreational and historic area."

The federal part of Nantucket Sound (more than three miles from shore) is also an ideal location for a wind farm because there are virtually no federal regulations for such projects. Massachusetts has outlawed industrial development in its waters because of the sound's importance to fish and wildlife.

The project is basically benign, with "minimal" impacts to fish and wildlife, avers the Corps in its 3,800-page draft environmental impact statement (DEIS) released in the fall of 2004. If you question the DEIS hatched by the outfit that brought us the Snake River dams and the flood-proof Mississippi and which has zero experience in US ocean wind farms because there hasn't been one yet, you are a rich, selfish NIMBY who doesn't want his view of the horizon marred by distant metal--at least according to large elements of the press and environmental community. Or, worse, you're a Kennedy. Or, worse still, you're a rich, elitist, gas-squandering boat angler whose aesthetic sensitivities preclude him from pursuing stripers, blues, tuna, mackerel, sea bass, scup, fluke, cod, haddock, false albacore, bonito, sharks, etc. within sight of a 24-square-mile industrial park full of tender vessels, fog horns, flashing lights, a transformer substation the size of a 10-story parking garage complete with a helicopter pad and tanks holding 40,000 gallons of transformer oil, and more than one hundred and thirty 247-foot-high power turbines whose 164-foot-long blades reach 417 feet into the sky (100 feet higher than the Statue of Liberty).

Wind power in the right place is a splendid idea; just as marine protected areas (MPAs) in the right place are a splendid idea. But some of the big green groups are so impatient, pigheaded, and politically naïve that they are hell-bent to put wind farms anywhere, provided they go in quick.

The United States Department of the Interior, which complains that "the DEIS is at best incomplete, and too often inaccurate and/or misleading."

Another is the US Environmental Protection Agency, which officially rates the DEIS as "inadequate" and whose regional director remarks: "We do not believe an adequate mitigation or monitoring plan can be developed, nor can a decision be made as to whether the project is environmentally acceptable and in the public interest."
The Massachusetts Division of Marine Fisheries notes: "Assertions that mobile finfish and invertebrates will simply move to other parts of the sound with no disruption of their life history during construction of the Cape Wind facility are not supported by the DEIS. Substantial changes may occur in spawning, feeding, and juvenile development of the affected species and these changes may have far-reaching impacts on fisheries in other states as well as impacts on more local species, including birds, that rely upon them for food." And the division charges that "no effort was made by the applicant to obtain comprehensive, representative, site-specific resource or habitat data" and that "the overall level of information provided in the DEIS is inadequate to properly evaluate the potential environmental impacts of this large and precedent-setting project." According to this allegedly "irrational" source, "this project may have substantial, even significant, impacts to fisheries resources, habitat, and harvest activities in Nantucket Sound."
And this warning from the Atlantic States Marine Fisheries Commission: "If the project is allowed to go through, the potential for post-construction exclusion of fishermen from the project site is very high for the following reasons: All access could become restricted for security . . .. Most recreational fishermen are not used to handling boats in strong eddies and would be at risk of collision with the bases of the turbines and other boats."

Although a decommissioning bond will be required, it has never been clear how it will be funded or how much it will be or if it will even be adequate, especially if the project has a shorter-than-expected operating life.

Serious safety questions are raised by the project. Horseshoe Shoal - the location chosen by the developer - is in the center of commerce and transportation between the Cape Cod mainland and the island communities of Martha's Vineyard and Nantucket, where year-round residents rely on boat and air travel. Three airports surround the project site.

John T. Griffin, vice chairman of the Barnstable Airport Commission, and Edward Barrett, president of the Massachusetts Fishermen's Partnership, wrote that each year three million people navigate the waters around the 24-square mile proposed project site and nearly 400,000 flights move through its airspace. In their view, erecting such a project in the midst of such a commercially active area that often experiences zero visibility conditions would be "utter recklessness."

Moreover, the Federal Aviation Administration has recently begun looking into the radar effects of large-scale wind turbines in close proximity to airports. The FAA designated a wind energy project in Wisconsin a hazard to aviation, and informed U.S. Rep. William Delahunt that recent briefings with United Kingdom Ministry of Defense representatives "seem to confirm our concern of potential interference from wind turbines to our own traffic control radar systems." The FAA is bolstering its reviews of such projects as a result of these briefings and is working closely with a Department of Defense team that is investigating how wind energy development impacts critical military radar systems.

As for environmentalist promoting the project, they seem committed to America's eat-anything-you-want energy diet. Not a whisper from them about the smartest and cheapest alternative of all--energy

conservation. In the best of all possible scenarios Cape Wind will assuage about one percent of New England's energy demand, producing about 170 megawatts. But a study commissioned by the Northeast Energy Efficiency Partnerships reveals that achievable energy conservation could produce a demand saving of 4,317 megawatts by 2008. According to the study, "cost-effective investments in energy efficiency can more than offset projected electric energy and peak demand growth, deferring the need for 28 combined-power plants of 300-megawatts in output each by 2013."

That's not to say that every little bit of juice dribbled into the New England power grid isn't important. But why is America rushing to pour more energy into such grids before it makes even a token effort to stem the outflow? Before we make an industrial park out of the best fishing area on the East Coast, it might make sense to, for example, flip off baseball-field lights that blaze for hours after the last out, cool it with the neon signs, turn down air-conditioning in office buildings so employees don't have to wear sweaters in summer, unplug the phalanxes of street lights along rural stretches of highway that do nothing but blind you, legislate a few gasoline-efficiency requirements, enact an energy bill that isn't political payola for the coal industry, the utilities and Big Oil--that sort of stuff.

Bottom line; this is the wrong place for this experiment, lets experiment with this offshore energy complex in an area that is more out of the way, so as not to make a BIG miscalculated mistake with Nantucket Sound. The risk/reward for this area doesn't justify building this huge complex. Start a little smaller and get our feet wet, then move on from there. Cape wind is all or nothing, and the only location to do it is Horseshoe shoes. If that is the case, then wind energy is not worth the effort and will make no noticeable environmental improvement. If HORSESHOE SHOALS is the only place that is economically feasible, As Cape wind states, then wind energy has no future here.

Thank you for your consideration,

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